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February 15, 2022

**VIA CM/ECF**

Honorable Thomas I. Vanaskie, Special Master  
Stevens & Lee, P.C.  
1500 Market Street, East Tower, 18th Floor  
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,  
No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Vanaskie:

Plaintiffs respectfully submit this letter in advance of the February 16, 2022 status conference.

**1. Update on status of Darring, O'Neill, and Wolfe**

Plaintiffs have filed notices of voluntarily dismissal without prejudice for Celestine Daring, Richard O'Neill, and Raleigh Wolfe.

**2. Extension of briefing deadlines for Class Certification-related motions**

This morning, the Parties met and conferred on the scheduling of the depositions of Defendants' class certification experts, the related briefing, as well as the upcoming *Daubert* hearings. Plaintiffs will be prepared to discuss this issue further with the Court at the status conference.

Hon. Thomas I. Vanaskie, Special Master

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Thank you for your courtesies and consideration.

Respectfully,



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ADAM M. SLATER

cc: All Counsel (via CM/ECF)